

**BARRACK, RODOS & BACINE**

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF IOWA PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM TO SECURITIES  
LEAD PLAINTIFF'S OBJECTION TO  
REORGANIZED DEBTORS' MOTION TO  
APPROVE SECURITIES ADR AND  
RELATED PROCEDURES FOR  
RESOLVING SUBORDINATED  
SECURITIES CLAIMS [D.I. 9189]**

1 Iowa Public Employees' Retirement System, the holder of a Securities Claim<sup>1</sup> and a  
2 creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of the above-captioned  
3 reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan, the "**Reorganized**  
4 **Debtors**"), by and through its undersigned counsel, submits this joinder ("**Joinder**") to  
5 *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve Securities ADR*  
6 *and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the  
7 "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to Approve*  
8 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket  
9 No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, Iowa Public Employees'  
10 Retirement System, respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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13 1. Iowa Public Employees' Retirement System is a Securities Claimant and timely filed  
14 proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. W#BKW27423 and  
15 NJD!\$27423).

16 2. Iowa Public Employees' Retirement System incorporates by reference and hereby  
17 joins in all arguments set forth in the Securities ADR Objection.

18 3. Iowa Public Employees' Retirement System reserves its right to supplement this  
19 Joinder and further reserves its rights to participate in any hearing to consider the Securities  
20 ADR Motion, including its rights to make any arguments and to examine witnesses.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities  
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as  
28 applicable.

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**CONCLUSION**

For all of the foregoing reasons, Iowa Public Employees' Retirement System respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

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